

1 MICHAEL A. JACOBS (CA SBN 111664)
2 MJacobs@mofo.com
3 ARTURO J. GONZÁLEZ (CA SBN 121490)
4 AGonzalez@mofo.com
5 MORRISON & FOERSTER LLP
6 425 Market Street
7 San Francisco, California 94105-2482
8 Tel: 415.268.7000 / Fax: 415.268.7522

9 KAREN L. DUNN (*Pro Hac Vice*)
10 kdunn@bsfllp.com
11 HAMISH P.M. HUME (*Pro Hac Vice*)
12 hhume@bsfllp.com
13 BOIES SCHILLER FLEXNER LLP
14 1401 New York Avenue, N.W.
15 Washington DC 20005
16 Tel: 202.237.2727 / Fax: 202.237.6131

17 WILLIAM CARMODY (*Pro Hac Vice*)
18 bcarmody@susmangodfrey.com
19 SHAWN RABIN (*Pro Hac Vice*)
20 srabin@susmangodfrey.com
21 SUSMAN GODFREY
22 1301 Avenue of the Americas, 32nd Floor
23 New York, NY 10019-6023
24 Tel: 212.336.8330 / Fax: 212.336.8340

25 Attorneys for Defendants
26 UBER TECHNOLOGIES, INC.
27 and OTTOMOTTO LLC

28
17 UNITED STATES DISTRICT COURT
18
19 NORTHERN DISTRICT OF CALIFORNIA
20
21 SAN FRANCISCO DIVISION

22 WAYMO LLC,

23 Plaintiff,

24 v.

25 UBER TECHNOLOGIES, INC.,
26 OTTOMOTTO LLC; OTTO TRUCKING LLC,

27 Defendants.

28 Case No. 3:17-cv-00939-WHA

**DECLARATION OF
THOMAS J. PARDINI IN SUPPORT
OF PLAINTIFF WAYMO LLC'S
ADMINISTRATIVE MOTION TO
FILE UNDER SEAL ITS MOTION
FOR RELIEF FROM NON-
DISPOSITIVE PRETRIAL ORDER OF
MAGISTRATE JUDGE (DKT. 2473)**

1 I, Thomas J. Pardini, declare as follows:

2 1. I am a member of the Bar of the State of California and an attorney at the law firm
 3 of Morrison & Foerster LLP. I make this declaration based upon matters within my own personal
 4 knowledge and if called as a witness, I could and would competently testify to the matters set
 5 forth herein. I make this declaration in support of Plaintiff Waymo LLC's Administrative Motion
 6 to File Under Seal Its Motion for Relief from Non-Dispositive Pretrial Order of Magistrate Judge
 7 (Dkt. 2473).

8 2. I have reviewed the following documents and confirmed that only the portions
 9 identified below merit sealing:

Document	Portions to Be Filed Under Seal
Exhibits 3, 4, and 5	Red Boxes

10 3. The red boxes in Exhibits 3, 4, and 5 to Waymo's Motion contain the email
 11 addresses of current and former company employees, whose electronic communications may
 12 become compromised if this information were disclosed to the public. Defendants seek to seal
 13 this information in order to protect the privacy of these individuals because this lawsuit is
 14 currently the subject of extensive media coverage. I understand that disclosure of this
 15 information could expose these individuals to harm or harassment.

16 4. Defendants' request to seal is narrowly tailored to the portions of Waymo's
 17 Motion and supporting exhibits that merit sealing.

18 I declare under penalty of perjury that the foregoing is true and correct. Executed this
 19 16th day of January, 2017 at San Francisco, California.

20
 21
 22
 23
 24 */s/ Thomas J. Pardini*

25 Thomas J. Pardini